

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 24-CR-20155-RAR(s)

UNITED STATES OF AMERICA

v.

**ENRIQUE PEREZ-PARIS,
DIEGO SANUDO SANCHEZ CHOCRON, and
GREGORY CHARLES MILO CASKEY
OMAR PALACIOS, and
NADIR PEREZ,**

Defendants.

/

GOVERNMENT'S EXHIBIT LIST

Presiding Judge: The Honorable Roldofo A. Ruiz II					AUSA: Reginald Cuyler Jr. James V. Hayes Matthew R. Belz	Defense Counsel: David Markus Lauren Krasnoff Andrew Feldman Marissel Descalzo
Courtroom Deputy: Graciela Gomez-Cano					Court Reporter: Ilona Lupowitz	
GX	Date Identified	Date Admitted	Sponsoring Witness	Objection/ Stipulated Admissions	Description	
1 - Counts						
2					Count 2 - Composite Exhibit for E.P.	
3					Count 3 - Composite Exhibit for E.P.	
4					Count 4 - Composite Exhibit for E.P.	
5					Count 5 - Composite Exhibit for E.A.	
6					Count 6 - Composite Exhibit for E.A.	
7					Count 7 - Composite Exhibit for E.A.	
9					Count 9 - Payment from Innovative Genomics to Tree Medical	
10 – Financial Summaries						
10					<i>Intentionally Blank</i>	

11					Accounts Reviewed
12					Transfers from Genetic Testing Laboratories to HCC Management Account at Regions x0104
13					Transfers from HCC Management Account at Regions x0104 to Perez-Paris, Caskey, Palacios, and Fallings
14					Personalized Genetics Transfers from Reddy to Caskey Account 3 at Wells Fargo x6077
15					IGX Claims Submitted for COVID-19 and Genetic Testing According to IGX's Financial Reports
16					IGX Claims Submitted for Genetic Testing According to IGX's Financial Reports
17					Claims Submitted by Test According to IGX's Financial Reports
18					Total Amounts Paid to IGX Account 3 and IGX Account 4 From November 2019 to June 2023
19					Deposit Account Control Agreement Transfers Between Alleon Capital Partners and IGX
20					Top 10 Payments to Alleon Capital from IGX Account 3 at Simmons x7610
21					<i>Intentionally Blank</i>
22					IGX Transfers to Sanchez Account at Wells Fargo x7687
23					Sanchez Escrow Payment for 865 Flower Avenue Los Angeles, CA
24					IGX Transfers to Caskey Account 1 at Frost Bank x4099
25					IGX Transfers to Caskey Account 1 at Frost Bank x4099 After 01/01/2022
26					Transfers from Caskey Account 1 at Frost Bank x4099 to Caskey Account 2 at Frost Bank x2280
27					Transfers from Caskey Account 2 at Frost Bank x2280 to NMI Accounts
28					Transfers from NMI I Account and NMI IV Account to Alexander Roka, M.D.
29					Transfers from NMI XVII Account at Frost Bank x0660 to Lloyd Van Winkle, M.D.
30					Transfers from NMI XXVI Account at Frost Bank x0860 to Naumit Bhandari, M.D.
31					IGX Paid Amounts to Tree Medical Solutions, LLC at JPMC x8011
32					Activity in Tree Medical and Palacios Accounts

100 – Data Summaries					
100					Data Summary Part B
101					Data Summary Part B Bene Residence
102					Data Summary Part B Count 2
103					Data Summary Part B Count 3
104					Data Summary Part B Count 4
105					Data Summary Part B Count 5
106					Data Summary Part B Count 6
107					Data Summary Part B Count 7
108					Data Summary Part B COVID Arellano Bene Residence
109					Data Summary Part B COVID Bene JL 3
110					Data Summary Part B COVID Bene RP 3
111					Data Summary Part B COVID Ordering Top 5 Arellano
112					Data Summary Part B Deceased
113					Data Summary Part B GTX Ordering Top 5 ALL List
114					Data Summary Part B GTX Ordering Top 5 ALL
115					Data Summary Part B GTX Ordering Top 5 Bhandari Timeline
116					Data Summary Part B GTX Ordering Top 5 Nguyen Timeline
117					<i>Intentionally Blank</i>
118					Data Summary Part B GTX Ordering Top 5 Vanwinkle Timeline
119					Data Summary Part B GTX Tier 2
120					<i>Intentionally Blank</i>
121					Data Summary Part B Reference Lab
122					<i>Intentionally Blank</i>
123					Data Summary Part B Timeline
124					IGX Claims Submitted to Blue Cross Blue Shield
125					IGX Claims Submitted to Blue Cross Blue Shield for Steven Steele
126					IGX Claims Submitted to Blue Cross Blue Shield for Michael Dorrell
127					IGX Claims Submitted to Blue Cross Blue Shield for Natasha Dorrell
128					<i>Intentionally Blank</i>
129					IGX Claims Submitted to Blue Cross Blue shield Tier 2 Codes

130-32					<i>Intentionally Blank</i>
133					IGX Claims Submitted to Humana Tier 2 Codes
134					IGX Claims Submitted to United Healthcare for COVID-19 and Genetic Testing
135					<i>Intentionally Blank</i>
136					<i>Intentionally Blank</i>
137					IGX Claims Submitted to United Healthcare Medicare for Tier 2 Genetic Testing Codes
138-41					<i>Intentionally Blank</i>
142					Number of Pharmozyme Tests Administered to IGX Patients
143					Select COVID 19 PCR Test Results w 3 or more days
144					<i>Intentionally Blank</i>
145					IGX's Claims Submitted to the HRSA COVID-19 Uninsured Program
146					IGX's Billing Trend for HRSA
147					<i>Intentionally Blank</i>
148					<i>Intentionally Blank</i>
149					Amounts HRSA Paid to IGX For Claims Referred by Select Providers
150					Top 20 DOS for Referred Claims
151					<i>Intentionally Blank</i>
152					Claims for Select Patients that IGX Submitted for Reimbursement to HRSA
153					Claims for J.A. that IGX Submitted for Reimbursement to the HRSA
154					Claims for L.B. that IGX Submitted for Reimbursement to the HRSA COVID-19 Uninsured Program
155					P. Family Claims IGX Submitted to HRSA
156					IGX PCR Test Purchases
157					S. Arellano Referred Covid Claims to HRSA by Month

200 – Claims, Enrollment, UPIC

200					Innovative Genomics, LLC Medicare Enrollment Application
200A					Innovative Genomics, LLC Medicare Enrollment Application (2020)
201					<i>Intentionally Blank</i>
202					42 CFR § 410.32 (Effective 2020.10.01)
203-09					<i>Intentionally Blank</i>

210					Innovative Genomics Recoup Recommendation (2019.12.16)
211					<i>Intentionally Blank</i>
212					<i>Intentionally Blank</i>
213					Innovative Genomics, LLC - Provider Education
214					Innovative Genomics, LLC - Medicare Part B Billing (2017-2024)
215					Innovative Genomics, LLC - Medicare Part B Referring (2017-2024)
216					Innovative Genomics, LLC - Medicare Part B Rendering (2017-2024)
217-30					<i>Intentionally Blank</i>
231					HRSA COVID Uninsured Program Terms and Conditions
232					<i>Intentionally Blank</i>
233					<i>Intentionally Blank</i>
234					Summary of HRSA Insurance Payments to Innovative Genomics
235					Innovative Genomics HRSA Uninsured Data (2020-2022)
236-56					<i>Intentionally Blank</i>
257					Humana Medical Coverage Policy for SARS-Cov-2 Testing (2022.01.15)
258-65					<i>Intentionally Blank</i>
266					Innovative Genomics Patient Roster Attestations
267					Innovative Genomics Provider Roster Attestations
268					Innovative Genomics TIN Administrator Attestation
269					Arellano Medical Clinic - Medicare Part B (2019.01.01 - 2024.12.26)
270					Family Medical Associates - Medicare Part B (2019.01.01 - 2024.12.26)
271					Javier Murillo - Medicare Part B Data (2019.01.01 - 2024.12.26)
272					Alexander Roka - Medicare Part B (2018.01.01 - 2024.07.24)
273					Lloyd Vanwinkle - Medicare Part B (2018.01.01 - 2024.07.24)
274					Naumit Bhandari - Medicare Part B (2018.01.01 - 2024.07.24)
275					Mary Nguyen - Medicare Part B (2018.01.01 - 2024.07.24)

276					Salvador Arellano - Medicare Part B (2018.01.01 - 2024.07.24)
277					Innovative Genomics LLC - Cigna East Data (2020 - 2023)
278					Innovative Genomics LLC - Cigna West Data (2020 - 2023)
279					Innovative Genomics LLC - Cigna HealthSprings Data (2020 - 2023)
280					Innovative Genomics Blue Cross of Texas Ancillary Provider Agreement
281					Innovative Genomics LLC - BCBSClaims Data (2020 - 2022)
282					Innovative Genomics, LLC - Humana Claims Data (2020 - 2023)
283					United Healthcare Covid Coverage Information
284					Innovative Genomics LLC - United Claims Data (2020 - 2023)
285					Innovative Genomics LLC - M&R Claims Data (2020 - 2023)
286					HHS Interim Final Rule Summary (2020.09.02)
287					Families First Coronavirus Response Act (2020.03.18)
288					Cares Act (2020.03.27)
289					Medicare Part B COVID-19 Test Coverage
290					42 C.F.R. § 411.15
291					42 U.S.C. § 1395y
292					Excerpts from Medicare Claims Processing Manual, Chp. 30 § 50 Advance Beneficiary Notice of Non-coverage
293					Reasonable Necessary Guidelines (Novitas)
294					Interim guidance for collection specimen
295					HRSA Patient Roster Attestation (2020.04 - 2021.06)
296					HRSA Patient Roster Attestation (2021.12 - 2022.03)
297					HRSA Program Administrator Attestation
298					HRSA - What Services are Eligible for Reimbursement
299					BCBS COVID-19 Coverage
300-Financial Records					
300					HCC Management Group LLC, Regions Bank Account x0104

301A					Innovative Genomics, LLC, Simmons Bank Account x7610
301B					Innovative Genomics, LLC, Simmons Bank Accounts x7645
301C					Innovative Genomics, LLC, Simmons Bank Accounts x7653
301D					<i>Intentionally Blank</i>
302					<i>Intentionally Blank</i>
303A					Innovative Genomics LLC, Simmons Bank, Accounts x7610
303B					Innovative Genomics LLC, Simmons Bank, Accounts x7645
303C					Innovative Genomics LLC, Simmons Bank, Accounts x7653
304					Innovative Genomics LLC, Bank of America, Account x7455
305					<i>Intentionally Blank</i>
306					<i>Intentionally Blank</i>
307					Innovative LLC, BBVA Compass-PNC Bank, Account x3283
308					Tree Medical Solutions LLC, JP Morgan Chase Bank, Account x8011
308A					Tree Medical Solutions LLC JPMC x8011
309					<i>Intentionally Blank</i>
310					Alleon Capital Partners LLC, Signature Bank, Account x3945
311					Ven Vamos Strategies LLC, JP Morgan Chase Bank, Account x9751
312					NMI I LLC, Frost Bank, Account x9078
313					NMI XXXVI LLC, Frost Bank, Account x9582
314					NMI XVII LLC, Frost Bank, Account x0660
315					Numedica Innovations LLC, Frost Bank, Account x2280
316					Gregory Milo Charles Caskey, Frost Bank, Account x4099
317					Enrique Perez-Paris, E-Trade Bank, Account x653
318					Tree Medical Solutions - Profit and Loss Data
319					Ven Vamos Strategies - Profit and Loss Data
320					Innovative Genomics Sales Reports (2023)
321					Innovative Genomics Sales Reports (2019 - 2022)
322					Gregory Milo Charles Caskey, Bank of America, Account x6077

323					NMI XVII LLC, Frost Bank, Account x0687
324					NMI XVII LLC, Frost Bank, Account x0695
325					NMI XXVI LLC, Frost Bank, Account x0860
326					Intentionally Blank
327					<i>Intentionally Blank</i>
328					Closing Documents for 969 Banyan Beach Drive
329					Intentionally Blank
330					Omar Palacios, JP Morgan Case Bank, Account x6579
331					Sanchez's account at Wells Fargo ending in x7687
332					NMI Account IV at Frost Bank x9108
400s – Patient Records, Data & Billing					
400					Innovative Genomics LIMS Orders (2019.12 - 2023.03)
401					Innovative Genomics LIMS Orders (2023.03 - 2024.04)
402					<i>Intentionally Blank</i>
403					Innovative Genomics LIMS Results (2023.03 - 2024.04)
404					Innovative Genomics LIMS Results_00
405					Innovative Genomics LIMS Results_01
406					Innovative Genomics LIMS Results_02
407					Innovative Genomics LIMS Results_03
408					Innovative Genomics LIMS Results_04
409					Innovative Genomics LIMS Results_05
410-12					<i>Intentionally Blank</i>
413					Composite COVID-19 Requisition Forms
413A					Composite COVID-19 Requisition Forms (Dr. Casanova)
413B					Composite COVID-19 Requisition Forms (Dr. Herman)
413C					Composite COVID-19 Requisition Forms (Salvador Arellano)
414					Composite COVID-19 Results
415					<i>Intentionally Blank</i>
416					<i>Intentionally Blank</i>
417					LIMS Field Descriptions
418-22					<i>Intentionally Blank</i>
423					Patient M.P. Medical Records
424					<i>Intentionally Blank</i>

425					Patient H.D. Medical Records
426					<i>Intentionally Blank</i>
427					Patient D.C. Medical Records
428					Patient E.L. Medical Records
429					<i>Intentionally Blank</i>
430					<i>Intentionally Blank</i>
431					Patient J.H. Medical Records
432					Patient B.B. Medical Records
433					<i>Intentionally Blank</i>
434					Patient H.H. Medical Records
435-37					<i>Intentionally Blank</i>
438					Patient D.M. Medical Records
439-49					<i>Intentionally Blank</i>
450					Patient C.H. Medical Records (2)
450A					Patient C.H. Medical Records
451					Patient C.H. Medical Records
452					Patient C.K. Medical Records (2)
453					Patient C.K. Medical Records
454-64					<i>Intentionally Blank</i>
465					Patient S.B. Medical Records
465A					Patient S.B. Medical Records
466-69					<i>Intentionally Blank</i>
470					Patient D.A. Medical Records
471					Patient D.A. (Nguyen Requisition Form)
472-80					<i>Intentionally Blank</i>
482					Patient J.W. Medical Records (2)
483					Patient J.W. Medical Records
484					Patient L.B. Medical Records
484A					Patient L.B. Medical Records
485					<i>Intentionally Blank</i>
486					<i>Intentionally Blank</i>
487					Patient T.K. Medical Records
488-95					<i>Intentionally Blank</i>
496					Patient A.B. Medical Records
496A					Patient M.D. Medical Records
496B					Patient N.D. Medical Records
496C					Patient J.L. Medical Records
496D					Patient R.P. Medical Records
496E					Patient S.S. Medical Records
500-Agency Records					

500					Innovative Genomics Petition for Bankruptcy (2023.08.28)
501					Innovative Genomics Declaration for Non-Individual Debtors (2023.09.18)
502					Florida Department of State Records for DSSC Investments LLC
503					Florida Department of State Records for Global Vision Medical LLC
504					Florida Department of State Records for HCC Management Group LLC
505					Florida Department of State Records for Innovative Genomics LLC
506					Florida Department of State Records for Preventive Health Partners LLC
507					Florida Department of State Records for Ven Vamos Strategies LLC
508					Florida Department of State Records for Tree Medical Solutions LLC Corp.
509					FDA EUA Declination Letter to Diego Sanchez (2020.10.13)
510					FDA EUA Declination Letter to Nader Nourizad (2021.06.08)
511					FDA EUA Declination Letter to Nader Nourizad (2022.08.12)
512					FL Driver and Vehicle Information for Rene Casanova
600-Contracts, Inventory, and Invoices					
600					Composite of Pharmozyme Invoices to IGX
601					Specimen Collection Services Agreement Ven Vamos Strategies LLC and Innovative Genomics (2022.01.18)
602					Specimen Collection Services Agreement Tree Medical Solutions and Innovative Genomics (2021.12.15)
603					LIMSABC for Clinical Service Agreement with Innovative Genomics (2019.10.28)
604					Composite of Tree Medical Solutions Invoices
605					Composite of Ven Vamos Invoices
606					Contribution of Agreement in Exchange for Percent Interests in Innovative Genomics (2019.07.16)
607					Alleon Capital Revolving Loan Financing Agreement with Innovative Genomics (2021.02.11)

608					Composite of ThermoFisher Invoices (2021.01.19)
609					Blank Specimen Collection Services Agreement Template
610					<i>Intentionally Blank</i>
611					ThermoFisher Invoicing Data for Innovative Genomics
700-Photographs					
700					Excerpts from Innovative Genomics' Website
701					Innovative Genomics PCR Testing Site Photo 1 (S.D. Fla)
702					Innovative Genomics PCR Testing Site Photo 2 (S.D. Fla)
703					<i>Intentionally Blank</i>
704					<i>Intentionally Blank</i>
705					Ven Vamos Website
706					Christian Balsera Headshot
707					Gregory Caskey Headshot
708					Salvador Arellano Jr Headshot
709					Matthew Herman Headshot
710					Nikita Hermesman Headshot
711					Marilian Banguela Headshot
712					Maggie Padron Headshot
713					Nadir Perez Headshot
714					Omar Palacios Headshot
715					Enrique Perez-Paris Headshot
716					Raul Martinez Headshot
717					Diego Sanchez Headshot
718					E.P. Headshot
719					E.A. Headshot
720					SW Photo of Pharmozyme One-Step RT qPCR Kit
800 - Recordings					
800					external-client-portal
800A					external-client-portal captioned
800B					external-client-portal (Transcript)
801					Adding a patient to create a Covid-19 test order - when pt portal was not used for pt information
801A					Adding a patient to create a Covid-19 test order - when pt portal was not used for pt information captioned

801B					Adding a patient to create a Covid-19 test order - when pt portal was not used for pt information (Transcript)
802					Creating a Covid test order for patients who register on the portal
802A					Creating a Covid test order for patients who register on the portal captioned
802B					Creating a Covid test order for patients who register on the portal (Transcript)
803					GoToAssist
803A					GoToAssist captioned
803B					GoToAssist (Transcript)
804					<i>Intentionally Blank</i>
805					innovativevgx-innovativevgx(External) Client Portal
805A					innovativevgx-innovativevgx(External) Client Portal captioned
805B					innovativevgx-innovativevgx(External) Client Portal (Transcript)
806					Patient Registration Portal - LIMSABC when you need results
806A					Patient Registration Portal - LIMSABC when you need results captioned
806B					Patient Registration Portal - LIMSABC when you need results (Transcript)
807					Retrieving Final Test Results
807A					Retrieving Final Test Results captioned
807B					Retrieving Final Test Results (Transcript)
808					It's All Public DOJ Sees Billion Dollars of Genetic Test Fraud; CMS Shows You Exactly Where and How
808A					It's All Public DOJ Sees Billion Dollars of Genetic Test Fraud; CMS Shows You Exactly Where and How captioned
808B					It's All Public DOJ Sees Billion Dollars of Genetic Test Fraud; CMS Shows You Exactly Where and How captioned (Transcript)
900 - Toll Records					
900A					Composite of Toll Records for Defendant Caskey
900B					Composite of Toll Records for Defendant Hermesman

901					Composite of Defendant Perez-Paris' Toll Records
902					Composite of Defendant Sanchez's Toll Records
1000-Documents and Communications					
1000					<i>Intentionally Blank</i>
1001					Reasons to Use Innovative Genomics Flyer
1002					Innovative Genomics COVID-19 Testing Flyer
1003					Innovative Genomics Do's and Don'ts for Compensation
1004					Innovative Genomics Compliance Risks and Guidance for Specimen Collectors
1005					Innovative Genomics Billing Slack Channel Excerpt
1006					Innovative Genomics Ownership Channel Excerpt
1007					Slack Messages from Seth Townson to Daryle Fallings Regarding Harbor Island Medical Clinic
1008					Message from Seth Townson to Daryle Fallings regarding Harbor Island Medical Clinic
1009					Slack Message Thread among Shane Wurzbach, Nikita Hermesman, Enrique Perez-Paris, and Daryle Fallings
1010					Slack Message Thread among Nikita Hermesman, and Enrique Perez-Paris
1011					Slack Message Thread among Enrique Perez-Paris, Daryle Fallings, and John Blanchard
1012					Slack Message Thread among Enrique Perez-Paris, Daryle Fallings, and Nikita Hermesman
1013					Remedial Plan for Salvador Arellano - 2014.08.01
1014					S. Arellano Blanket Order
1015					J. Murrillo Blanket Order
1016					J. Murrillo's Termination Letter to S. Arellano
1017					Text thread between Nikita Hermesman and Ruben Guerrero
1018					DOJ charging 18 people -- including doctors -- in massive Covid health-care fraud takedowns
1019					<i>Intentionally Blank</i>
1020					2022.02.03 Email from Sally Camacho to Tammy Venus Subject: Re Potential Fraud
1021-24					<i>Intentionally Blank</i>

1025					2021.11.01 Email from Ruben Guerrero to Enrique Perez-Paris, Diego Sanchez, and Nikita Hermaesman Subject: Dr. Pesano's Official Recommendation . . . Entering the COVID Ab arena and COVID testing in general
1026-29					<i>Intentionally Blank</i>
1030					2021.02.04 Email from Mohammad Yaha Rouhani to Diego Sanchez Subject: Re: Pharmozyme Cov-19 RT-qPCR Kit Quote for Innovativegx
1031					2021.02.04 Attachment for Pharmozyme email communications regarding RT-qPCR kit
1032					2020.10.14 Email from Diego Sanchez to Steven Howard, Cynthe Simms, and Milo Caskey - Subject: Fwd: Review Complete - EUA202534
1033					<i>Intentionally Blank</i>
1034					<i>Intentionally Blank</i>
1035					2022.03.29 Email from Brian Lowe to Pejman Rahimian - Subject: Re: CPT2200489 Innovative Gx
1036					2021.09.15 Email from Mark Aston to Billing Questions (Slack) - Subject 16:01:16 UTC: Mark Aston@Slack -> [billing-questions@Slack]
1037					<i>Intentionally Blank</i>
1038					<i>Intentionally Blank</i>
1039					Innovative Gx Patient Registration Disclaimer
1040					<i>Intentionally Blank</i>
1041					<i>Intentionally Blank</i>
1042					2022.01.18 Email from Diego Sanchez to Enrique Perez-Paris and Nikita Hermesman - Subject: HRSA Guidelines on Patient Eligibility Verification for Uninsured Benefits
1043					2021.12.13 Email from Brett Walker to Innovative Genomics, Diego Sanchez, Nikita Hermesman, Ryan Corker, Parthiban Muthiah Subject FW: Effective LCD & LCA for Pharmacogenomics Testing Novitas
1044					2021.12.13 Email Attachment - LCD - Pharmacogenomics Testing (L39063)
1045					2021.12.13 Email Attachment - Article - Billing and Coding: Pharmacogenomics Testing (A58801)

1046					<i>Intentionally Blank</i>
1047					2021.10.22 Email from Imal Chathuka to Diego Sanchez, Christina Pruneda, Enrique Perez-Paris, Nikita Hermesman, Milo Caskey, Andrea Messina - Subject: Payer Guidelines on COVID 19 Surveillance Testing & Return to Work Testing
1048					2021.06.28 Email from Christina Pruneda to Diego Sanchez - Subject: Re: NGS BILLING UPDATE
1049					<i>Intentionally Blank</i>
1050					<i>Intentionally Blank</i>
1051					2021.07.30 Email from Milo Caskey to Diego Sanchez - Subject: RE: Notice of Distribution
1052-55					<i>Intentionally Blank</i>
1056					2021.01.30 Email from Diego Sanchez to Milo Caskey, Enrique Perez-Paris, Nikita Hermesman - Subject: FWD: Latest Update on Novitas Reimbursements on Genetic Testing
1057					2021.01.30 - Attachment to Email Subject: FWD: Latest Update on Novitas Reimbursements on Genetic Testing
1058					2021.05.26 Email from Wayne Rodriguez to Diego Sanchez - Subject: RE: CGX
1059					<i>Intentionally Blank</i>
1060					2022.06.20 Email from Ruben Guerrero to Enrique Perez-Paris - Subject: PGx Audit Report and PGx Onboarding New Compliance Policies
1061					2022.06.20 Email Attachment - Audit Report and Plan for Compliance
1062					2022.04.21 Email from Tammy Venus to Nikita Hermesman - Subject: FW: OIG Participates in the 2022 National COVID-19 Health Care Fraud Enforcement Action
1063					2022.03.25 Email from Shane Wurzbach to Nikita Hermesman, Diego Sanchez, Enrique Perez-Paris et al. - Subject: Invitation Slack Clean Up Call @ Tue Mar 29, 2022 10am - 11am (CDT)
1064					2022.03.25 Email from Imal Chathuka to Chris Pruneda - Subject: Updated Billing Protocol for Covid+RPP

1065					2020.10.30 Email from Perez-Paris to Raul Martinez - Subject Re Update - keep momentum
1066					2020.09.17 Email from Kristie Jacobs to Milo Caskey, Enrique Perez-Paris, Nikita Hermesman, Diego Sanchez - Subject: IG PGx
1067					2019.12.03 Email from Enrique Perez-Paris to Milo Caskey - Subject: Coding for PGx
1068					2019.12.03 Email Attachment - List of PGX/CGX Codes
1069					<i>Intentionally Blank</i>
1070					2020.10.26 Email from Nikita Hermesman to Innovative Genomics - Subject: Compliance Alert - Covid 19
1071					2019.07.02 - Hermesman, Sanchez, Perez-Paris, Caskey Thread
1072					<i>Intentionally Blank</i>
1073					<i>Intentionally Blank</i>
1074					2022.10.08 Email from Enrique Perez-Paris to Jessica Minor, Christina Pruneda - Subject: Re: COVID test results still not received
1075					2022.01.08 - A.M. - Innovative Gx Lab Test Results
1076					2022.01.08 - F.M. - Innovative Gx Lab Test Results
1077					2022.01.08 - J.M. - Innovative Gx Lab Test Results
1078					2022.01.17 Slack Message from Enrique Perez-Paris - A lot of angry patients from their samples not being collected properly
1079					2021.12.27 Email from Christina Pruneda to Enrique Perez-Paris - Subject: Re: Pcr test result never received
1080					Nikita Hermesman, Enrique Perez-Paris, Gregory Caskey Thread
1081					2019.11.26 DOJ Western District of Pennsylvania Press Release - Pittsburgh-area Lab Owner Charged with Paying Kickbacks in Connection with Almost \$130 Millions in Medicare Claims for Genetic Testing
1082					2018.09.12 DOJ District of Maryland Press Release - CEO of Lab Testing Company Marketing Representative Sentenced to Federal Prison in Pain Management Clinic Kickback Scheme

1083					Intentionally Blank
1084					Slack message from Enrique Perez Paris Re: OTC COVID Complaint
1085					2021.12.25 Email from Enrique Perez-Paris to A.S. - Subject: Re: Patient registration confirmation
1086					2022.02.19 Email from Enrique Perez-Paris to J.H. - Subject Re: Stolen identity
1087					2022.02.09 Email from Enrique Perez-Paris - Subject Re: Test Results Notification
1088					2022.02.08 - D.W. - Innovative Gx Lab Test Results
					<i>Intentionally Blank</i>
1090					2021.11.06 Email from Mohammad Rouhani to Diego Sanchez - EUA Status
1091					2021.03.10 Email from Nader Nourizad to Diego Sanchez - Subject: Covid Kit
1092					2022.01.27 Slack Message from Diego Sanchez - We got awarded testing for the State of Kentucky
1093					2022.02.07 Slack Message from Diego Sanchez to Tech Support - This patient received a report from a test he preformed a month ago
1094					2021.12.21- Nikita Hermesman and Diego Sanchez Text Thread - I don't see it or have it
1095					2021.07.21 Lab Alert: Changes to CDC RT-PCR for SARS-CoV-2 Testing
1096					Hermesman, Sanchez, Perez-Paris, Palacios Text Thread Attach
1097					Hermesman, Sanchez, Perez-Paris, Palacios Text Thread
1098					Slack Message from Diego Sanchez re Pharmozyme Not EUA
1099					Nikita Hermesman and Diego Sanchez Text Thread
1100					2021.07.28 Hermesman Sanchez Thread (attachment to Ex. 1099 thread)
1101					2021.07.28 Hermesman Sanchez Thread (attachment to Ex. 1099 thread)
1102					<i>Intentionally Blank</i>
1103					Ravitej Reddy, Gregory Caskey, Enrique Perez-Paris et al., Text Thread
1104					Referrals from Gregory Caskey and Alexander Roka to Ravitej Reddy
1105					<i>Intentionally Blank</i>

1106					Innovative Genomics Ownership Channel Excerpt
1107					2018.10.10 Email from Kelly Mazur to Hadley, Georgene Barnes, Chris Calvetti, Ravi Reddy - Subject: Fwd: Numedica Registration
1108					PGL Laboratories New Account Registration Alexander Roka, MD
1109					PGL Laboratories New Account Registration Leticia Cerdá, MD
1110					2019.06.21 Email from Kelly Mazur to Ravitej Reddy - Subject: Fwd: Bank account info if you can transfer if not sending you his address as well
1111					2019.01.24 Email from Kelly Mazur to Chris Calvetti, Milo Caskey, Ravitej Reddy - Subject: Re: PGX Portal
1112					2020.11.26 Email from Milo Caskey to Nikita Hermesman - Subject: Fwd: Admera Health Announcement
1113					2021.11.09 Email From Milo Caskey to Nikita Hermesman, Diego Sanchez - Subject: Fwd: CMS medical records request
1114					2021.11.09 Email From Milo Caskey to Nikita Hermesman, Diego Sanchez - Attachment 1
1115					2021.11.09 Email From Milo Caskey to Nikita Hermesman, Diego Sanchez - Attachment 2
1116					2021.11.09 Email From Milo Caskey to Nikita Hermesman, Diego Sanchez - Attachment 3
1117					2021.05.17 Email from Janice Alexander to Milo Caskey, Nikita Hermesman, Shane Wurzbach - Subject: Basic training videos for MC's
1118					<i>Intentionally Blank</i>
1119					<i>Intentionally Blank</i>
1120					2021.04.05 Nikita Hermesman and Milo Caskey Text Thread - We need to start
1121					<i>Intentionally Blank</i>
1122					Omar Palacios and Marilán Banguela Text Thread
1123					<i>Intentionally Blank</i>
1124					2021.11.30 Email from Omar Palacios to Nikita Hermesman - Subject Re: Marketing & Info (Michael) Lab
1125					<i>Intentionally Blank</i>

1126					2022.01.19 Email from Omar Palacios to Diego Sanchez - Subject: Re: List of Sites in need of Provider
1127					<i>Intentionally Blank</i>
1128					2021.11.09 Email from Omar Palacios to Nikita Hermesman, Diego Sanchez, Enrique Perez-Paris - Subject: Genetic Volume 2021
1129					2021.11.09 Email from Omar Palacios to Nikita Hermesman, Enrique Perez-Paris, Diego Sanchez - Subject: Fwd: Genetic Report 2020
1130					<i>Intentionally Blank</i>
1131					<i>Intentionally Blank</i>
1132					St. Vincent De Raul Mother of Christ New Account Form
1133					2021.09.17 Email from Omar Palacios to Leanne LeFebvre - Subject Re New Account
1134					2021.09.17 Email from Omar Palacios to IGX - Subject New Account
1135					2021.09.17 Attachment to Email - Subject New Account
1136					2021.09.01 Email from Omar Palacios to Leanne LeFebvre - Subject Re Prime care
1137					2021.08.09 Email from Leanne LeFebvre to John Blanchard - Subject Re Meeting
1138					2021.09.24 Email from Nikita Hermesman to Omar Palacios - Subject Re Innovative GX Broward
1139					2021.09.01 Email from Leanne LeFebvre to Omar Palacios - Subject Broward Blvd Portal Login
1140					2021.09.02 Email from IGX to IGX - Subject Re NEW ACCOUNT FORM
1141					<i>Intentionally Blank</i>
1142					Fraga Pediatric PrimeCare Family Centers New Account Form
1143					<i>Intentionally Blank</i>
1144					<i>Intentionally Blank</i>
1145					DOJ Double Helix Press Release
1146					Hermesman, Palacios Ralph SA, Text Thread
1147					Hermesman, Palacios, Ralph SA Laredo Indictment Text Thread
1148					<i>Intentionally Blank</i>
1149					Hermesman, Sanchez, Palacios Text Thread
1150-52					<i>Intentionally Blank</i>

1153					2022.03.29 Email from IGX to IGX Team - Subject Re Puerto Rico Testing Site - Insurance
1154					2022.05.24 Email from Diego Sanchez to Nikita - Subject Spreadsheet shared with you
1155					2022.05.19 Email from Michael Siprut to IGX Team - Subject Re Ven Vamos Christian
1156					2022.05.04 Email from Christina Pruneda to Tammy Venus - Subject Re Aetna Call- Alvarez
1157					2022.03.11 Email from Diego Sanchez to Ven Vamos - Subject Re Puerto Rico Testing Site
1158					2022.03.17 Email from IGX to Alika Faulkner - Subject Re Samples Received Less Than
1159					2022.03.15 Email from IGX to Alika Faulkner -Subject Re Alegria ADC - Pending Rapid Result
1160					2022.03.12 Email from IGX to Alika Faulkner - Subject Re Alegria ADC - Pending Rapid PCR
1161					<i>Intentionally Blank</i>
					<i>Intentionally Blank</i>
1163					2021.02.02 Email from K.H. to IGX - Subject Re Fwd K.H.
1164					2024.04.19 Email from K.D. to Jordan Flores - Subject Re FWD Covid Results
1165					K.D. LIMS Final Report
1166					2022.02.24 Email from E.S. to IGX - Subject Re TR Test Results Notification
1167					2022.02.14 Email from Sally Camacho to LIMSABC Supp - Re Patients Not Receiving Results
1168					2022.02.17 Email from C.G. to IGX - Subject Re PCR results
1169					2022.02.06 Email from Luis Velazco to E.S. - Subject Re Test results request
1170					2022.01.12 Email from Alika Faulkner to E.R. - Subject Re No covid results
1171					2022.01.05 Email from L.W. to IGX - Subject Re My results
1172					2022.01.12 Email from Alika Faulkner to K.D.- Re Patient registration confirmation
1173					2022.01.06 Email from Carlos Rodriguez to K.B. - Subject Re My PCR test results
1174					2022.01.06 Email Attachment - Subject Re My PCR test results

1175					2021.05.18 Email from L.R. to Seth Townson- Subject Re Thank you for Registering Your
1176					2022.01.16 Email from Jorge Duque to V.S. - Subject Re Covid Test Results
1177					2021.12.26 Email from Carlos Rodriguez to E.A. - Re 24hr Covid Test Not Received
1178					2022.01.02 Email from Perez-Paris to Lay A - Subject Re Urgent PCR test
1179					2021.01.06 Email from Perez-Paris to K.C. Subject Re URGENT – Re: Sample Status
1180					2021.01.14 Email from Perez-Paris to N.V.- Subject Re Test Results.
1181					2021.09.12 Email from Perez-Paris to Q.G. - Subject Re Negative and Positive
1182					2022.01.22 Email from Perez-Paris to Omar Palacios - Subject Re Samples not on Lims
1183					2022.03.15 Email from Keith Thornton to Brian Lowe - Subject Re LDT for Covid-19
1184					2021.11.08 Email from Perez-Paris to A.A.- Subject Re Possible Bill
1185					HCC Contract w Clio
1186					Hermesman and Palacios Text Thread

Dated: February 19, 2025

Respectfully submitted,

HAYDEN O'BYRNE
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF FLORIDA

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CERTIFICATE OF SERVICE

I hereby certify that, on February 19, 2025, I filed the forgoing document with the Clerk of the Court via ECF.

/s/ Reginald Cuyler Jr.